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COMMISSION

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VIA HAND DELIVERY

Mr. Charles Terreni
Chief Clerk/Administrator
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Verizon's Comments Regarding the Commission's Proposed Changes to Article 6

In compliance with the Notice issued by the Public Service Commission of South Carolina on November 8, 2005, Verizon Communications, Inc. ("Verizon") respectfully submits the following comments to the Commission's Proposed Changes to Article 6.

These comments are the result of comparing the Commission's proposed revisions with those submitted by the Office of Regulatory Staff ("ORS") on October 25, 2005. The ORS's proposed revisions were the result of collaborative discussions between representatives of the ORS and various telephone companies.

Together, the two attachments list all the proposed changes to the rules. In its initial review, Verizon has no suggested changes to Attachment A because the Commission's proposed changes, while not identical to those in the proposal submitted by the ORS, are consistent in concept with the ORS's proposal. Nevertheless, Verizon reserves the right to revise its position, as appropriate, as these proceedings progress.

In regards the Commission's proposed changes, listed in Attachment B, Verizon urges the Commission to reject these changes and to adopt the proposed changes suggested in the ORS filing.

Respectfully submitted,

Stan Bugner

Enclosures

**ATTACHMENT A TO VERIZON'S LETTER
DATED DECEMBER 1, 2005**

Verizon has no suggested changes at this time to the Commission's proposed changes to the rules set forth below. Unless otherwise noted, the Rule Numbers are those that appear in the Commission's proposed changes.

103-600 (Authorization of Rules)
Omission of FCC as a defined term. (Collaborative Proposed 103-602.4).
103-602.2 (definition of Access Line)
103-602.3 (definition of Commission)
103-602.4 (definition of Customer)
103-602.6 (definition of Interexchange Carrier)
103-602.7 (definition of ORS)
103-602.8 (definition of PSP)
103-602.9 (definition of Radio Common and Cellular Carrier)
103-602.10 (definition of Reference)
103-602.11 (definition of Standard Network Interface Device)
103-602.12 (definition of Telephone Utility)
103-603 (Authorization for Rates and Charges)
103-606 (Service Offerings)
Omission of Filing Requirements (Collaborative Proposed 103-607)
103-610 (Location of Records and Reports)
103-611 (Retention of Records)
103-615 (Accidents)
103-616 and all subparts (Complaints Received from the ORS)
103-617 (Tests)
103-619 (Held Applications/Availability of Service)
103-621.2 (Amount of Deposit)
103-621.4 (Deposit Records)
103-621.7 (Deposit Credit)
103-622 (Customer Billing)
103-622.1 and all subparts (Bill Forms)
103-622.2 (Late Payment Charges)
103-622.4 (Payment by Check)
103-622.5 (Deferred Payment Plan)
103-623 (Adjustment of Bills)
103-623.1 (Customer Willfully Overcharged)
103-623.2 (Customer Inadvertently Overcharged)
103-623.3 (Customer Undercharged Due to Willfully Misleading Company)
103-623.4 (Customer Undercharged Due to Human or Machine Error)
103-624.1 (Method)
103-624.3 (Termination)
103-625 (Reasons for Denial or Discontinuance of Service)
103-627 (Rights of Access)
103-628 (Customer Complaints)

103-630 (System Which Telephone Utility Must Maintain)
103-633 (Procedures for Termination of Service)
103-640 (Requirements for Good Engineering Practice)
103-641 (Acceptable Standards)
103-642 (Acceptable References)
103-643 (Adequacy of Service)
103-645 (Hazardous Locations)
103-646 (Emergency Operation)
103-650 (Utility Inspection and Test)
103-652 (Testing Facilities)
103-654 (Maintenance of Plant and Equipment)
103-660 (Quality of Service)
103-662 (Restrictions on Use of Service)
103-663 and all subparts (Service Standards)
103-670 (Acceptable Standards)
103-671 (Protective Measures)
103-672 (Safety Program)
103-680 (Role of the Advisory Committee)
103-681 (Committee Name)
103-682 (Composition of the TRS Advisory Committee)
103-683 (Meetings)
103-684 (Commission Approval)

**ATTACHMENT B TO VERIZON'S LETTER
DATED DECEMBER 1, 2005**

Unless otherwise noted, the Rule Numbers are those that appear in the Commission's proposed changes.

- 103-601 (Application of Rules)
- Need to add definition of Written or In Writing (Collaborative Proposed 103-602.12)
- 103-602.1 (Definition of 900 Numbers needs to be 900 Services)
- 103-602.5 (delete definition of Information Provider)
- 103-604 (Territory and Certificated Area)
- 103-605 (Utility Rules and Regulations)
- 103-612 (Data to be Filed with the Commission and provided to the ORS)
- 103-613 (Inspection of Telephone Utility Plant)
- 103-614 (Interruption of Service)
- 103-618 (Service Reports)
- 103-620 (Customer Information)
- 103-621 (Customer Deposits)
- 103-621.1 (Deposit Receipt)
- 103-621.3 (Interest on Deposits)
- 103-621.5 (Deposit Retention)
- 103-621.6 (Unclaimed Deposits)
- 103-622.3 (Disconnection and Reconnection)
- 103-624 (Application for Service)
- 103-624.2 (Obligation)
- 103-626 (Insufficient Reasons for Denying Service)
- 103-628.1 (Written Complaints)(we prefer the Collaborative Proposed 103-616.1)
- 103-628.2 (Oral Complaints)(we prefer deleting this)
- 103-629 (Tariffs, Rules, and Regulations)
- 103-631 and all subparts (Directories)
- 103-632 and all sub-parts (900 & 900-Type Services Offerings)
- 103-644 (Inspection of Plant)
- 103-651 (ORS Inspection and Test)
- 103-653 (Trouble Reports)
- 103-661 (Interruptions of Service)